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5 Attorneys for Defendant
6 FRIT ESCONDIDO PROMENADE, LLC

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11 LARRY McIVER,)
12 Plaintiff,)
13 vs.)
14 TARGET CORPORATION dba)
TARGET #274; COST PLUS, INC.)
15 dba COST PLUS WORLD)
MARKET #145; FRIT)
16 ESCONDIDO PROMENADE, LLC;)
LA SALSA, INC. dba LA SALSA)
17 #93; APPLEBEE'S)
RESTAURANTS WEST, LLC dba)
18 APPLEBEE'S NEIGHBORHOOD)
BAR & GRILL #5711; TOYS 'R' US)
19 - DELAWARE, INC. dba TOYS 'R'
US #5633; PARTY CITY)
20 CORPORATION dba PARTY CITY)
OF ESCONDIDO #445; INLAND)
21 WESTERN MDS PORTFOLIO,)
LLC,)
22 Defendants.)
23)

Civil Action No. 08 CV 0132 IEG WMC
JOINT MOTION FOR EXTENSION
OF TIME TO FILE RESPONSIVE
PLEADING
Hon. Irma E. Gonzalez

24 Pursuant to CivLR 12.1 of the Local Rules of Practice for United States District
25 Court, Southern District of California, Defendant FRIT Escondido Promenade, LLC
26 (“Defendant”) and Plaintiff Larry McIver (“Plaintiff”), hereby jointly move for an order
27 extending the time for Defendant to file its response to Plaintiff’s Complaint. The parties
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1 jointly request that the deadline for filing Defendant's First Responsive pleading be
2 extended 30 days, from February 19, 2008 to March 20, 2008.

3 Good cause exists for granting an extension. Defendant has only recently retained
4 counsel, Pillsbury Winthrop Shaw Pittman LLP, and counsel needs time to review the facts
5 and allegations in order to prepare a proper response. The case involves numerous specific
6 allegations regarding ADA accessibility at several large retail stores and restaurants located
7 at a large shopping center, as well as corresponding parking and other common areas.

8 DATED: February 15, 2008
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10 PILLSBURY WINTHROP SHAW PITTMAN LLP

11 By 
12 Stefan Teichert
13 Attorneys for Defendant FRIT ESCONDIDO
PROMENADE, LLC

14 DATED: February 15, 2008
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16 DISABLED ADVOCACY GROUP, APLC
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18 By 
Lynn Hubbard, III
19 Attorneys for Plaintiff LARRY McIVER

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CERTIFICATE OF SERVICE

2 I hereby certify that on the 15th day of February, 2008, a true and correct copy of
3 the foregoing **JOINT MOTION FOR EXTENSION OF TIME TO FILE**
4 **RESPONSIVE PLEADING** was electronically transmitted to the Clerk of the Court using
5 the ECF System for filing and transmittal of a Notice of Electronic Filing to the ECF
6 registered parties in the case.

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A handwritten signature in black ink, appearing to read "Brenda Edgington". The signature is fluid and cursive, with a horizontal line drawn underneath it.

Brenda Edgington